



.....Group of Companies

 **Digital Modus**
Professional Services

 **Digital Modus**
Software Solutions

 **Digital Modus**
Recruiting

Data Privacy Policy

DM/104/05

ISO 27001:2022

ISO 9001:2026



Crown
Commercial
Service
Supplier

PUBLIC

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Document Information

Document Control

Version	Date	Author	Comments
DM/104/01	1st February 2022	Nick Howes	Initial Draft
DM/104/02	7th February 2022	Nick Howes	Changes following HR Consulting review
DM/104/03	27th July 2023	Kerry Brannigan	Annual Review, Policies numbered & Google Approval Requested from Directors
DM/104/04	30th June 2024	Kerry Brannigan	Annual Review: Revised DPO contact email address
DM/104/04	30th June 2025	Kerry Brannigan	Annual Review: new branding only
DM/104/05	8th June 2026	Kerry Brannigan	Legislations updates to "Overview" Legislation updates to "what your rights are"

Distribution List

Name	Role
Staff	All Staff employed by Digital Modus must-read.
Contractors	All people involved on behalf of a subcontractor contracting with Digital Modus must-read.
Suppliers	Shared with Suppliers as part of Digital Modus supplier onboarding.
Customers	Shared with all Customers on request.

Overview

Your privacy is important to Digital Modus. In this notice, we have collated all the things you need to know about how we collect, store and treat your data. We have updated our privacy notice and policies to include additional information required under applicable data protection regulations – including the UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025 – such as the following:

- Why we process personal data
- Legal grounds for processing personal data
- Your rights under the UK GDPR and Data (Use and Access) Act 2025, and how to exercise them
- Contact information for the Digital Modus data controller

“Personal data” is information relating to an identified or identifiable natural person.

What We Need

Our Personal Data Protection Policy governs the use and storage of your data. Digital Modus is a Controller of the personal data you, the “data subject”, provide us.

We collect the following types of personal data from you:

- Some tracking info about your visit to our website.
- Google Analytics tracking information.
- Information that you provide to us requesting services or information from us.
- Personal information for the purposes of recruitment (CVs, cover letters, contact information).

We do not collect “personal sensitive information”.

How We Collect Information From You

We collect and retain data in a number of ways. You might submit personal, business or contact info through written correspondence (email or mail), phone calls, web forms, shared documents, face-to-face meetings, video conferencing, social media conversations and other means. We also use automated ways of collecting information, including the use of cookies and Google Analytics tracking codes.

Why We Need It

We need your personal data for administrative and business purposes in relation to delivering our products and services to you.

What We Do With It

Your personal data is processed in the UK. Hosting and storage of your data takes place in Google Data Centers located [here](#). We only use your personal information as submitted by you and only for the purposes requested by you upon submission of that information. No third-party providers have access to your data unless specifically required by law.

Information Security

We work hard to protect Digital Modus and our users from unauthorised access to or unauthorised alteration, disclosure or destruction of information that we hold. In particular:

- We review our information collection, storage, and processing practises, including physical security measures, to guard against unauthorised access to systems.
- We restrict access to personal information to Digital Modus employees, contractors and agents who need to know that information in order to process it for us and who are subject to strict contractual confidentiality obligations. They may be disciplined or their contract terminated if they fail to meet these obligations.

How Long We Keep It

We will retain your personal data as long as there is a lawful basis for doing so. After this period, your personal data will be irreversibly destroyed. Any personal data held by us for marketing and service update notifications will be kept by us until such time that you notify us that you no longer wish to receive this information.

What Your Rights Are

You have the right under the UK General Data Protection Regulation and the Data (Use and Access) Act 2025 to request from Digital Modus access to and rectification or erasure of your personal data, data portability, restriction of processing of your personal data, and the right to object to the processing of your personal data. When responding to access requests, Digital Modus will conduct reasonable and proportionate searches of the information we hold about you.

Cookies

Cookies help us to understand how many unique visitors we have had to our website, whether you have been here before or not, and indeed, where you have come from on the internet. Information from cookies will help develop our marketing and web strategies. These files do not allow us to personally identify anyone, and we cannot track any of your web activities that are not related to Digital Modus's websites. Cookies also cannot be used as code to deliver malware or viruses to your computer. We will only use visitor information to help improve our services and sites.

If you do not feel comfortable having sites use cookies to gather information, you can usually disable cookie collection in your browser settings. Disabling cookies can affect how some websites appear, and some of their functionality might not be fully available.

Privacy Policy Updates

We may update this Privacy Policy from time to time as we introduce new products and services, as we improve our current offerings and as technologies and laws change. Any changes will become effective upon our posting of the revised Privacy Policy.

How to Make a Complaint

In the event that you wish to complain about how we have handled your personal data, you can contact our Data Protection Officer using the details below or by submitting a complaint via email to info@digitalmodus.com

We will acknowledge your complaint within 30 days of receipt and respond without undue delay. Our DPO will investigate your complaint and work with you to resolve the matter. If you remain unsatisfied with how your complaint has been handled, or if you feel that your personal data has not been handled appropriately according to the law, you have the right to lodge a complaint directly with the Information Commissioner's Office (ICO) at ico.org.uk or by calling 0303 123 1113.